ENVIRON

December 22, 1988

HAND DELIVER

Mr. John DeFina
New Jersey Department of Environmental Protection
Bureau of Environmental Evaluation, Cleanup and
Responsibility Assessment
401 East State Street, Fifth Floor
Trenton, New Jersey 08625

Re: Presentation of the ECRA Sampling Results Report for
Hexcel Corporation, Lodi, New Jersey
ECRA Case No. 86009

Dear John:

Enclosed find three (3) copies of the Presentation of the ECRA Sampling Results Report for the Hexcel Corporation's Lodi facility. Included in this submittal are the Tier II data packages for the analytical results discussed in the report.

The following paragraphs and the attachments to this letter provide information regarding operations and equipment at the site, as requested in the December 28, 1987 conditional approval letter from NJDEP. Please note that responses have been provided only to those items requesting further information about operations and equipment.

Condition 6: An accurate, scaled plot plan shall be required for Area of Environmental Concern #1 (AEC #1) and AEC #15. The exact location of the utility tunnel at AEC #1 shall also be included.

Response: A scaled plot plan of AEC 1 is included in the results report as Plate 1. AEC 15 is also plotted on Plate 1. In addition, Attachment 1 to this letter provides a detailed plot plan of the interior of the Boiler Room in AEC 15. The location of the utility tunnel in relation to Building 1 is shown on Attachment 2. Based on ENVIRON's measurements, the tunnel starts in the sump area in Building 1 and runs east under the

maintenance building, where it turns to the south and dead ends at Molnar Road. The tunnel is located between approximately 2 and 8 feet below grade surface.

Condition 8: The following information on the recovery well at (AEC #1) shall be provided: total depth, length of screen, screen setting, amount of oil recovered and with method of disposal.

Response: The recovery well was drilled and constructed by Warren George, Inc. of Jersey City, New Jersey. The well log is presented as Attachment 3. The well was drilled to a depth of 12 feet and constructed using 10 feet of 4-inch PVC screen from 2 to 12 feet below ground surface. The well construction was completed as a flush mount type. Oil and water recovered from the well were sent to the ENSCO, Inc. facility in El Dorado, Arkansas for disposal. Attachment 4 contains copies of the Uniform Hazardous Waste Manifests.

Condition 17: Hexcel Corporation shall provide information on the production well and on the cooling system provided by the well. It shall include: total depth, diameter, length of casing, pump setting and well log.

Response: The cooling system used at the facility is a non-contact type. Water pumped from the production well is circulated around reaction vessels and discharged to the industrial sewer. A log for the production well is not available. However, a recent cleaning of the well has produced information concerning its construction. The well is 240 feet deep and is constructed as an open-hole bedrock well with 30 feet of 12-inch steel casing at the surface. The pump is set at the base of the well.

Condition 22: Hexcel Corporation shall provide the location of the transformer fire (noted on page II-8 of Appendix 8, Exhibit B) on a site map and shall sample for Petroleum Hydrocarbons and PCB in 0-6" increment.

Response: As discussed in ENVIRON's letter to the NJDEP dated January 23, 1987, the fire occurred approximately 11 years ago on a PSE&G-owned utility pole located just outside the property

(see Attachment 5). Soil boring 102 was drilled and sampled for TPHCs and PCBs. PCBs were not detected above the informal ECRA action level.

Condition 24: Two samples of oily seep material in steam tunnel shall be analyzed for PCB's. When Sampling Plan results are submitted, Hexcel Corp. shall provide the location of all present and former fuel oil and hot oil system tanks with associated piping.

Response: During the implementation of the Sampling Plan, the location and dimensions of the steam tunnel were measured as requested in Condition 6. At that time, examination of the tunnel evidenced no oily material in the tunnel, and therefore no samples were collected.

There are four fuel oil tanks present at the site. Two underground fuel tanks have been abandoned and do not presently contain any product. There are two aboveground fuel tanks which Fine Organics Corp. presently uses. All four tanks are located in AEC 1 (see Plate 1, Sampling Plan Results report). Piping for the underground tanks runs from the tanks underground and into the Boiler Room. The aboveground tank piping follows the same path above the ground.

The hot oil system has not been in operation since 1980 and is located in the Boiler Room (see Attachment 1). As discussed in ENVIRON's letter to the NJDEP dated January 23, 1987, information regarding the hot oil system is limited. The only person with detailed knowledge of the system is deceased. Mr. Jim Higdon (Fine Organics Corp.) has supplied a diagram he believes to be the plan for construction of the system; however, he is unsure of the accuracy of the information in this plan. The diagram is enclosed as Attachment 6.

Condition 29: If available, disposal site of contaminated soils from holding pond beneath Building 11 shall be provided.

Response: Conversations with long-time employees at the facility and review of past records for the site produced no information regarding the disposal of soil removed from the holding pond beneath Building 11.

In addition, NJDEP has voiced concern as to the possibility of radiological conditions at the site. Preliminary results of a recent radiological survey by the Department of Energy (DOE) indicate that determined no remedial action is required. Attachment 7 is a letter from the DOE documenting the results. Hexcel will provide NJDEP with any additional information it receives regarding this issue.

ENVIRON has begun implementing the additional sampling deemed necessary to develop a site cleanup plan which, in accordance with ENVIRON's letter to you dated on June 30, 1988, must be submitted on or before February 21, 1989. During the week of December 5, 1988, ENVIRON drilled 11 soil borings in and around Building 11 to further define the structural contour of the clay layer beneath the site and to determine the extent of Dense Non-Aqueous Phase Liquids (DNAPLs) detected in MW6. ENVIRON has also resampled several of the monitoring wells to confirm previous analytical results. In addition, on November 23, 1988, during the cleaning of the production well, ENVIRON conducted geophysical testing (gamma, electric, caliper) to determine the nature of soil and bedrock underlying the site at depths not encountered during monitoring well installation. This work, along with additional testing (slug tests, borings, well installation, etc.) at the site, have been initiated in an attempt to expedite remediation efforts at the site, even though formal approval from your agency has not yet been received.

If you have any questions regarding the Sampling Plan Results report, the information provided in this letter, or ongoing investigations being completed at the site, please do not hesitate to call.

Very truly yours,

Arthur W. Bozza

Arthur W. Bozza
Staff Geologist

Robert L. Powell

Robert L. Powell, Ph.D., P.E.
Principal

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Enclosures

cc: Lisa Murtha Bromberg (w/out attachments)
A. William Nosil (w/out attachments)